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Attorneys for Movant

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Irene A. Halin	Case No. 16-12306-MBK
Debtor.	Judge: Michael B. Kaplan

CREDITOR'S CERTIFICATION OF DEFAULT

- DON FONTANA certifies as follows:
1. I am a BK SPECIALIST for CHAMPION, a secured creditor of the debtor (the "Movant").
MORTGAGE
 2. On November 26, 2018, an Order was entered, a copy of which is attached as an exhibit, providing for the cure of post-petition real estate tax arrearages, and if in default of future homeowner's insurance and tax payments, allowing the Movant ex parte relief to vacate the stay, with notice to the trustee, debtor and his attorney, if any.
 3. Debtor has failed to comply with the aforesaid order:
☒ By missing payments and/or by failing to make the correct payments as summarized on the attached Certification of Creditor Regarding Post Petition Payment History.
☐ Other _____.
 4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay.
 5. I certify under penalty of perjury that the above is true.

July 29, 2020
Date

[Signature]
Signature

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In re:	Chapter 13
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**CERTIFICATION OF CREDITOR REGARDING POST-PETITION PAYMENT
HISTORY (NOTE AND MORTGAGE DATED MARCH 24, 2010)**

DON B. FONTANA of full age, employed as BK SPECIALIST by
CHAMPION MORTGAGE, hereby certifies the following information:

Recorded on 4/5/2010, in Monmouth County, NJ, in Book OR-8826, at Page 2375

Property Address: 102 Rumford Way, Manalapan, NJ 07726

Mortgage Holder: Nationstar Mortgage LLC d/b/a Champion Mortgage Company

Mortgagor / Debtor: Irene A. Halin

POST-PETITION PAYMENTS (petition was filed: 2/9/2016)

	Amount Due	Date Payment was due	How Payment was Applied	Amount Received	Date Payment Received	Check or Money Order No.
Agreed order entered 11/26/2018						
1	\$3,864.53	4/9/2020(taxes)	Manalapan Township Taxes	\$0.00		
TOTAL	\$3,864.53			\$0.00		

PAYMENTS PAST DUE: MANALAPAN TWP TAXES 2019 \$3,864.53

AMOUNT HELD IN SUSPENSE (if any): (\$0.00)

TOTAL POST-PETITION DEFAULT: \$3,864.53

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

July 29, 2020
Date

[Signature]
Signature



Order Filed on November 26, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC
Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
**Nationstar Mortgage LLC d/b/a Champion
Mortgage Company**
Aleisha C. Jennings 049302015

In Re:

Irene A. Halin,

Debtors.

Case No.: 16-12306-KCF

Chapter: 13

Hearing Date: November 14, 2018

Judge: Kathryn C. Ferguson

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: November 26, 2018


Honorable Kathryn C. Ferguson
United States Bankruptcy Judge

Page 2

Secured Creditor: Nationstar Mortgage LLC d/b/a Champion Mortgage Company

Secured Creditor's Counsel: RAS Citron, LLC

Debtors' Counsel: Law Office of Robert Manchel

Property Involved ("Collateral"): 102 Rumford Way, Manalapan, NJ 07726

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- ☐ The Debtor brought account current pursuant to the Motion for Relief from Stay filing on __.
- ☐ The Debtor is overdue for __ months from _____ through _____.
- ☒ The Debtor is overdue for post-petition real estate taxes in the amount of \$ 2,897.00.
- ☐ The Debtor is assessed for _____ late charges at \$ _____ per month.

Funds Held In Suspense \$0.00.

Total Arrearages Due \$2,897.00.

2. Debtor must cure all post-petition arrearages, as follows:

- ☒ The amount of \$2,897.00 shall be capitalized in the Debtor's Chapter 13 plan. Debtor must file an Amended Plan, and Schedules I and J within fifteen (15) days of the entry of this Order. The debtor's monthly payment to the Chapter 13 Trustee will be modified to an amount necessary to appropriately fund the plan in accordance with this order.
- ☒ Pursuant to the terms of Debtor's Reverse Mortgage, Debtor shall maintain home owner's insurance on the subject property, as well as make timely tax payments to the tax collector.

☐ A subsequent cure payment shall be made in the amount of _____. Payment shall be made no later than _____.

☐ This Order is incorporated into any Order confirming the plan. The Trustee is to pay the arrears identified in this Order.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Monthly cure payment:

Champion Mortgage Company
P.O. Box 609093
Dallas, TX 75019

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 7 and Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 and Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

If the bankruptcy case is dismissed, or if the automatic stay is vacated, the filing of a new bankruptcy case will not act to impose the automatic stay against the Secured Creditor's opportunity to proceed against its Collateral without further Order of the Court.

5. Award of Attorneys' Fees:

- The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

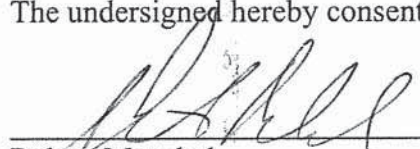
The fees and costs are payable:

- Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.


Robert Manchel
Executive Center of Greentree
One Eves Drive, Suite 111
Marlton, NJ 08053
Attorney for Debtor(s)
Date: 11/21/18

/s/Aleisha C. Jennings

Aleisha C. Jennings
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Attorney for Secured Creditor
Date: 11/21/2018

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CERTIFICATION OF SERVICE

1. I, Shelly M. Rodriguez :
 - ☐ represent the _____ in the above-captioned matter.
 - ☒ am the secretary/paralegal for McCalla Raymer Leibert Pierce, LLC who represents the Movant.
 - ☐ am the _____ in the above case and am representing myself.
2. On July 31, 2020, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
 - Certification of Default
 - Certification of Post-Petition Payment History
 - Order

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

July 31, 2020
Date

/s/Shelly M. Rodriguez
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court *)
Irene A. Halin 102 Rumford Way Manalapan, NJ 07726	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court *)
Office of The United States Trustee One Newark Center 1085 Raymond Boulevard Suite 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court *)
Robert Manchel Law Office of Robert Manchel Executive Center of Greentree One Eves Drive, Suite 111 Marlton, NJ 08053	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.